## REMARKS/ARGUMENTS

**Claim Amendments**

The Applicant has amended claims 17 and 35 to clarify the language of the claims. Applicant respectfully submits no new matter has been added. Accordingly, claims 1-37 are pending in the application. The Office Action Summary indicates that claims 15, 16 and 34 are not pending but, the Applicant has not withdrawn or canceled these claims. The Detailed Action addresses and rejects these unlisted claims, so the Applicant will consider the claims as current, active claims and argue accordingly. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

**Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 1-10, 12, 14-22, 25-31, 34-37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang et al (hereinafter Chang) U.S. Patent 6,681,114 in view of Philyaw, (hereinafter Philyaw) U.S. Patent 6,835,799. The Applicant respectfully traverses the rejection of these claims. The Applicant respectfully points out that the cited Philyaw patent is the wrong patent number. The number should be US 6,836,799 and the Applicant is using the US 6,836,799 reference in response to the rejection.

The Applicant respectfully directs the Examiner's attention to claim 17 of the present application.

> 1. (Previously Presented) In a network resolution domain a User Distribution Server (UDS) disposed to determine from a plurality of network servers a specific network server in charge of a user under a particular service environment, said UDS comprising:
>
> a secondary database having storage for a plurality of user identifiers for identifying the user under different service environments, and selected service data per specific network server and per user basis;
>
> a mechanism for transferring said plurality of user identifiers and selected service data to said secondary database from primary databases associated with respective network servers;
>
> a querying mechanism for receiving a service request from a Service Requester Node; and

> a response mechanism for sending a server identifier of said specific network server to the Service Requester Node in response to the service request, wherein the server identifier is usable by said Service Requester Node to determine said specific network server. (emphasis added)

The applicant respectfully asserts that neither Chang nor Philyaw, individually or in combination, disclose the emphasized subject matter.

As previously explained, the present invention addresses the issue of distributing users among a plurality of network servers. Each user is given (assigned) a plurality of user identifiers applicable for different services which are stored in the claimed secondary database (Figure 2). The present invention teaches how a plurality of user identifiers for a single user is distributed among different network servers, each network server being in charge of the user when using one of the plurality of assigned user identifiers for a particular service.

The Examiner's attention is directed to the data structure shown in Figure 2, which illustrates how the plurality of user identifiers for one user, under different service environments, is respectively associated with a number of network servers. All of the user identifiers are for one user and each of the identifiers associates the user with a particular server (or service or both). Additionally, Fig. 1 illustrates how the UDS is connected with primary databases associated with respective network servers. The distribution of the identifiers applied to a specific user can be carried out independently from user identifier schemes, structures and applicable services.

The UDS, as claimed in claim 1 and illustrated in Figure 2, has a secondary database having storage for the plurality of user identifiers, each of the identifiers identifying the same user under different service environments, and a mechanism for transferring said plurality of user identifiers and selected service data to said secondary database from the primary databases associated with respective network servers.

The Chang reference is cited for disclosing "a plurality of user identifiers on a per subscriber basis for identifying a user under different service environments" (see page 3 of the Detailed action). The portion of Chang used to reject this element of claim 1 is not identified by the Examiner. However, lines 6-7 of the rejecting paragraph 5 cite a

secondary database in the Chang reference having a user identifier (fig.3, profile database 107). The Applicant assumes that the Examiner means to connect the description of Chang's profile database as containing the user identifiers claimed in Applicant's claim 1. As stated by claim 1, a plurality of user identifiers is applied to one user and they are stored in the secondary database. In contrast to the present invention, Chang stores profile data for a user. A user ID is part of the user's profile and nowhere in Chang is the user associated with more than one ID. In fact, there are numerous references to the user ID throughout the Detailed Description and all the references state "the user ID" (a single ID).

Chang does not disclose a user having a plurality of user identifiers for identifying the user under different service environments. Consequently, Chang cannot address the issue of distributing users among a plurality of network servers, with each network server using one of the plurality of user identifiers (i.e., assigned to the user) to identify and take charge of the user for a particular service. Also, nothing in the Chang reference discloses or suggests a secondary database having storage for a plurality of user identifiers that identify (or are associated with) the user under different service environments, as illustrated in Fig. 2. And, there is nothing in the Chang reference discloses a mechanism for transferring the plurality of user identifiers and selected service data to the secondary database.

As submitted in a previous communication, the failure of Chang to disclose "a secondary database having storage for a plurality of user identifiers for identifying the user under different service environments and selected service data per specific network server and per user basis" and "a mechanism for transferring said plurality of user identifiers and selected service data to said secondary database from primary databases associated with respective network servers" is not remedied by the teaching in Philyaw.

Philyaw unambiguously discloses a "...unique user ID" for a user. The term "unique ID" is repeated throughout the Philyaw reference. For instance; in the summary of the Philyaw reference, "A profile application is implemented on a computer of the user which is disposed on a network to track the network activity of the user, the profile

application having a unique ID...". Furthermore, "The CRS 2500 has associated therewith a CRS database 2502 which stores the user profile information and the unique user ID associated with each user profile. The unique ID is issued back to the user in the form of a bar code 2508 having the unique ID number which is readable by the user", and also: "There is only one bar code 2508 generated for the user having the unique digital ID, and bar code 2508 and/or digital ID provides the reference in the CRS database 2502 to the user's associations and profile". (see Figure 25) There should be no question that the language in the Philyaw reference refers to only one ID for the user.

Thus, a skilled person in the act does not find a motivation to apply the teaching in Philyaw in order to achieve a distribution of users among a plurality of network servers as in the present invention, where each user is given a plurality of user identifiers applicable for different services. Different user identifiers of a user can be distributed among different network servers, each network server being in charge of the user with a certain user identity for a particular service.

Philyaw does not disclose a user having a plurality of user identifiers, nor does Philyaw disclose distribution of the plurality of user identifiers wherein the user identifiers are used to identify the user under different service environments among a number of network servers.

Consequently, Philyaw fails to disclose "a secondary database having storage for a plurality of user identifiers for identifying the user under different service environments and selected service data per specific network server and per user basis" and "a mechanism for transferring said plurality of user identifiers and selected service data to said secondary database from primary databases associated with respective network servers". The Applicant respectfully requests withdrawal of the rejection of claim 1, analogous claims 17 and 35 and the claims 2-10, 12, 14-16, 18-22, 25-31, 34 and 36-37 all depending respectively from each of the independent claims.

Claims 11, 13, 21, 23, 24, 32, and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang et al (hereinafter Chang) U.S. Patent 6,681,114 in view

of Philyaw, (hereinafter Philyaw) U.S. Patent 6,835,799 in view of Richard Paul Ejzak, (hereinafter Ejzak) U.S. Patent No. 6,871,070. The Applicant respectfully traverses the rejection of these claims.

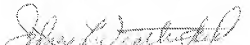
The Ejzak reference is cited for teaching a Domain Name Server. The Applicant respectfully submits that the Ejzak reference lacks the limitations that are also lacking in the Chang and Philyaw references; at least the limitation of the plurality of user identifiers being applied to a user (single). Since the references Chang, Philyaw and Ejzak either individually or in combination do not teach the recited limitation, the Applicant respectfully requests withdrawal of the rejection of the above referenced claims.

## CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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